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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

CASE NO. 3:17-cv-00939-WHA

13 Plaintiff,

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANT OTTO TRUCKING'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ITS  
RESPONSE TO WAYMO'S  
SUPPLEMENTAL BRIEF IN SUPPORT  
OF ITS MOTION FOR ORDER TO  
SHOW CAUSE**

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

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1 I, Felipe Corredor, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion  
 7 to File Under Seal Portions of Its Response to Waymo’s Supplemental Brief in Support of its Motion  
 8 for Order to Show Cause (“Administrative Motion”). The Administrative Motion seeks an order  
 9 sealing highlighted portions of Otto Trucking’s Response to Waymo’s Supplemental Brief in Support  
 10 of its Motion for Order to Show Cause (“Otto Trucking’s Response”) and of Exhibits 2 and 22 to the  
 11 Vu Declaration, as well as the entirety of Exhibits 3-4, 8-19, 23, 25, and 28-30 thereto.

12       3. Otto Trucking’s Response and Exhibit 22 (portions marked in red boxes in versions  
 13 filed herewith), Exhibits 2-4, 9, 17-19, 25, and 30 (green highlighted portions in versions filed  
 14 herewith), and Exhibits 8, 10-16, and 28 (entire documents) contain, reference, and/or describe  
 15 Waymo’s highly confidential and sensitive business information. Such information includes details  
 16 regarding Waymo’s security measures and protocols (including staffing of Google’s security team),  
 17 the scope of forensic investigations conducted (including the identity of non-public targets of those  
 18 investigations), and detailed computer forensics regarding access to Waymo’s trade secrets. I  
 19 understand that Waymo maintains this information as confidential. The public disclosure of this  
 20 information would cause significant competitive harm to Waymo, as its security measures and  
 21 computer forensics methods would become known to competitors who could use such information to  
 22 Waymo’s disadvantage. Otto Trucking’s Response further contains highly confidential and sensitive  
 23 business information. The information Waymo seeks to seal regards confidential analysis of  
 24 Waymo’s business and competition. I understand that this confidential business information is  
 25 maintained by Waymo as secret. The public disclosure of this information would give Waymo’s  
 26 competitors access to in-depth insight into—and analysis of—Waymo’s business strategy for its  
 27 autonomous vehicle system. If such information were made public, I understand that Waymo’s  
 28 competitive standing would be significantly harmed

1       4. Exhibits 2-4, 8-9, 11, and 13-18, and 30 also contain email addresses and/or phone  
 2 numbers of Waymo employees and former employees involved in this case, the disclosure of which  
 3 would cause Waymo and those employees substantial harm due to the high public profile of this  
 4 litigation.

5       5. Exhibits 2-4, 13, 16-18, 25, and 30 additionally contain highly sensitive information  
 6 that Waymo seeks to seal. Specifically, those portions contain the domains that host Waymo's highly  
 7 confidential SVN repository and other computer systems. Public disclosure of such information will  
 8 give bad actors seeking to hack Waymo's databases a target to attack. Further, there is no public  
 9 purpose served by disclosing the precise web or IP address at which the servers reside.

10      6. Exhibit 11 additionally contains, discusses, or refers to confidential details regarding  
 11 prototype development and testing of Kitty Hawk and/or related entities, which Waymo understands  
 12 are highly confidential to Kitty Hawk, and disclosure of such information would inflict serious and  
 13 irreparable damage to Kitty Hawk's business. (*See* Dkt. 1115 ¶ 3.)

14      7. Exhibit 17 additionally contains, references, and/or describes Waymo's confidential  
 15 technical information. The information Waymo seeks to seal includes the confidential design and  
 16 functionality of Waymo's proprietary autonomous vehicle system, which Waymo maintains as secret.  
 17 I understand that these designs are maintained as secret by Waymo (Dkt. 25-47) and that the designs  
 18 are valuable to Waymo's business (Dkt. 25-31). The public disclosure of this information would give  
 19 Waymo's competitors access to descriptions of the functionality or features of Waymo's autonomous  
 20 vehicle system. If such information were made public, I understand that Waymo's competitive  
 21 standing would be significantly harmed.

22      8. Waymo's request to seal is narrowly tailored to those portions of Otto Trucking's  
 23 Response and Exhibits 2-4, 8-19, 22, 25, 28, and 30 that merit sealing. The request is consistent with  
 24 previous sealing requests granted by the Court. (*See, e.g.*, Dkt. 1444.)

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1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on September 19, 2017.

4 By /s/ Felipe Corredor  
5 Felipe Corredor  
6 Attorneys for WAYMO LLC

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8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
10 document has been obtained from Felipe Corredor.

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12 By: /s/ Charles K. Verhoeven  
13 Charles K. Verhoeven